

Cook, Sheridan

From: McInnis, Amanda <Amanda.McInnis@hdrinc.com>
Sent: Wednesday, July 10, 2013 2:40 PM
To: Laidlaw, Tina
Subject: RE: US Conference of Mayors, AWWA, and WEF Affordability Assessment Tool

When you get a chance, please give me a call. I was a little surprised that you didn't talk about EPA's request to include 0.1 mg/L TP in the progression of general variance levels. What's the status of that issue?

From: Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]
Sent: Wednesday, July 10, 2013 2:36 PM
To: McInnis, Amanda
Subject: RE: US Conference of Mayors, AWWA, and WEF Affordability Assessment Tool

Thanks Amanda!

From: McInnis, Amanda [mailto:Amanda.McInnis@hdrinc.com]
Sent: Wednesday, July 10, 2013 2:35 PM
To: jblend@mt.gov; Laidlaw, Tina
Cc: Clark, Dave; Suplee, Mike
Subject: US Conference of Mayors, AWWA, and WEF Affordability Assessment Tool

Jeff and Tina—

Attached is the information I referenced yesterday about an alternative affordability assessment tool.

Amanda

From: Clark, Dave
Sent: Wednesday, June 26, 2013 5:48 PM
To: McInnis, Amanda; Stober, Trent; Chapman, Matt; Kyle, Ted; Close, Craig; Pessina, Michael; Brooks, Richard L.; Lykens, Kenneth; Holland, Jeremy (Portland); Stonehouse, Greg; Olson, Dan; Frissora, Joseph; Kalisiak, Kip; Gilbert, Susan; Ellmers, Glen E.; Talbot, Peter; Stein, Julie; Marroquin, Shirley; Duffy, Jennifer; Frommer, Jennifer; Bill, Eric; Larocque, Stephane; Dwyer, Blaine
Cc: Hammond, Dave; Willey, Bruce
Subject: US Conference of Mayors, AWWA, and WEF Affordability Assessment Tool

The US Conference of Mayors, the American Water Works Association and the Water Environment Federation have published a joint affordability analysis for utilities to assess compliance with EPA requirements. I believe that this is the document that was referenced in the EPA Region 10 Integrated Planning Workshop held in collaboration with NACWA, Oregon ACWA, and WEF we attended in Portland in April.

<http://www.awwa.org/resources-tools/water-utility-management/affordability-assessment.aspx>

The assertion is that EPA's affordability criteria rely too heavily on median household income and underestimate the effect of rising water bills on low-income, fixed-income, and renter-occupied households. This joint issue brief offers several alternative metrics for better gauging the affordability of water mandates:

- As a percentage of income for potentially vulnerable populations
- Across neighborhoods known to be economically at risk
- Through a variety of other indicators such as the unemployment rate and the percentage of households receiving public assistance The Affordability Assessment Tool and spreadsheets are attached for your reference and use. I think it will be interesting to apply this tool to cases where we are considering Integrated Plans to see where affordability limits are reached, or exceeded, when we evaluate the combined regulatory compliance requirements for wastewater treatment, nutrient removal, CSO/SSO control, stormwater compliance, etc.

DAVID L. CLARK
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